

BALTIMORE
OCT 11 2019

Attachment A

The undersigned parties hereby stipulate and agree that the following facts are true and accurate, and that if this matter had gone to trial, the government would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter gone to trial.

Background on the Supplemental Nutrition Assistance Program ("SNAP"):

The Supplemental Nutrition Assistance Program ("SNAP"), formerly known as the "Food Stamp Program," is a program funded by the USDA in accordance with the Food Stamp Act of 1977, established by the U.S. Government to alleviate hunger and malnutrition among low-income families. The USDA works with state governmental agencies, such as the Maryland Department of Human Resources (DHR), to assist low-income individuals who qualify to purchase groceries and certain food items.

Individuals can file a SNAP benefits application in person, by mail, or online. The online application requires the applicant's name, address, state of birth, and Social Security Number. Once an applicant is verified, DHR conducts a telephone interview to confirm eligibility for SNAP. If approved, SNAP benefits are loaded onto EBT cards similar to commercial debit cards, with the account number and cardholder's name imprinted on the front of the card. The EBT cards also have personal identifying information and other data concerning the applicant stored on them electronically. Each month, EBT cards are automatically credited with the appropriate level of food stamp benefits for each SNAP recipient in order to subsidize food purchases at participating supermarkets, convenience stores, and other food retailers.

SNAP benefits may only be used to purchase specific food items, and SNAP benefits may not be exchanged for cash or other items of value, a practice known as "trafficking."

Wire Fraud Conspiracy and Identity Theft:

Sara Renee Keaton ("Keaton"), age, 59, is a resident of Baltimore, Maryland.

Between in or about 2013 through July 16, 2020, Robert Lee Snowden, Jr. ("Snowden") devised, and conspired to devise, a scheme to defraud DHR and the federal SNAP program. The scheme involved using the stolen identification information of victims to obtain SNAP benefits. The SNAP benefits were sold for cash, at approximately 50% of the SNAP value. Through this scheme, Snowden and others obtained money and property from, and caused a loss to, DHR and the SNAP program. Snowden's co-conspirators included Bertrand and Sarah Renee Keaton ("Keaton").

In approximately 2011, Snowden worked for a temporary staffing agency and was placed at a health care business where he was responsible for enrolling new health care professionals into the network. In his capacity as a "Credentialing Specialist," Snowden had access to lists of health care professionals, containing their personal identifying information, including their name, date of birth, and social security number. Snowden stole the lists of health care professionals before he was laid off from the position. Snowden was aware that the health care professionals were real people.

Beginning in approximately 2013, Snowden began to use the stolen identities of the health care professionals to apply for SNAP benefits through DHR's online portal. During the course of the scheme, Snowden created false identity documents, such as birth certificates, drivers' licenses, and social security cards, in the names of victims in order to provide supporting documents when requested by DHR during the application process. On the applications, Snowden listed addresses of acquaintances, or nearby addresses of vacant homes that Snowden or his associates had access to, for the mailing of the SNAP cards. Snowden or another at his direction would pick up the SNAP cards from the listed address.

Snowden sold the majority of the SNAP benefits, by selling SNAP cards to buyers at 50% of the value loaded on the card. After the buyer used the SNAP card, the card was returned to Snowden, who would sell the SNAP benefits to another buyer when the next month's benefits were loaded. From 2013 through 2020, over 220 victims' identities were used to apply for SNAP benefits in Maryland, and at least ~~\$1,021,583.72~~ in SNAP benefits were issued and redeemed through this scheme.

\$500,000.00 P-R GAB-S.K

Snowden maintained bank accounts at Wells Fargo Bank. From June 2013 through February 2020, cash totaling \$109,496.27 was deposited into Snowden's accounts at Wells Fargo Bank. Keaton is listed as a co-owner on all of the Wells Fargo accounts.

Keaton lives at 75 N. Monastery Ave, Baltimore, Maryland. Keaton has known Snowden for years, and she refers to him as her nephew and he refers to her as his aunt. Snowden used Keaton's address and other nearby addresses Snowden had access to for the mailing of SNAP cards. Keaton would open the mail and send a photo of the SNAP card to Snowden using her cell phone. Snowden would go to Keaton's residence to obtain the SNAP cards and other DHR mailings from Keaton, and would operate the scheme from Keaton's residence while he was there. Starting no later than June 2014, more than 21 fraudulently obtained SNAP accounts used Keaton's home address, resulting in the mailing of SNAP cards and other correspondence to Keaton's residence, and at least 5 fraudulent SNAP applications were submitted using Keaton's home internet services.

Snowden sold fraudulent SNAP cards to Keaton and people Keaton knew for 50% of the value of the SNAP card. From 2017 through March 2020, Keaton used fraudulently obtained SNAP cards in the name of 61 different victims to purchase over \$13,000 worth of groceries from various Sam's Clubs. Included in these totals are video recordings of Keaton using fraudulently obtained SNAP accounts in the names of victims on the following dates:

- December 7, 2019: Keaton was captured on video conducting a transaction at the

Sam's Club in Catonsville, using Maryland SNAP cards listed to victims AA and TC. The SNAP account of TC lists physical address of 75 N. Monastery Ave, Baltimore, Maryland. TC is a licensed medical professional in Texas;

- December 13, 2019: Keaton was captured on video conducting a transaction at the Sam's Club in Catonsville, Maryland using 2 Maryland SNAP cards and one visa card. One of the cards was issued to Keaton, and the other was issued to victim "TC," referenced above.
- February 14, 2020: Keaton was captured on video conducting a transaction at the Sam's Club in Catonsville, Maryland using two 2 Maryland SNAP cards. One of the cards was issued to Keaton and the other was issued to victim "JC." The SNAP account of JC listed Snowden's residence as the physical address.

On July 16, 2020, investigators executed a search and seizure warrant at Keaton's residence.

- 2 mailings from DHR addressed to Keaton's address, in the name of two separate fraud victims, located in Keaton's mail box;
- The following items from inside a handbag in the living room:
 - A Wells Fargo Visa Debit card in the name Robert L Snowden;
 - A Maryland SNAP card issued to "A.G.", a Baltimore City resident.
- Wells Fargo Bank statements addressed jointly to Sara R. Keaton and Robert L. Snowden;
- A Wells Fargo debit card in the name Robert Snowden;
- Mail in Snowden's name including, insurance, medical correspondence, credit card bills, and bank statements;
- Mail addressed to Snowden at different addresses;
- Keaton's phone, containing a picture of a SNAP cards in the name of various victims, that Keaton sent to Snowden dating back to 2016; and
- Lined paper with name and address of DT.

DT is a friend of Keaton. From December 2017 through December 2019, DT used fraudulently obtained SNAP cards in the name of 41 different victims to purchase over \$6,000 worth of groceries from various Sam's Clubs.

During the execution of the search warrant at Keaton's residence on July 16, 2020, Keaton provided a voluntary statement to investigators, including the following:

- Keaton admitted to buying SNAP cards from Snowden for cash, in the amount of half the value of the card;
- She was aware that Snowden obtained the SNAP accounts using the stolen identities of real people, and that she was aware that the people had to be real for the accounts to "work";
- She stated that after she used the benefits on a card, she returned the card to Snowden;
- In response to inquiries from Snowden, she would send him photos of the cards from her phone;
- She identified a hand written list of Snowden's, and stated that Snowden used the list to track the amount of money on the SNAP cards;


Interstate Wires:

Snowden executed the scheme, in part, through the use of mobile phones, the internet, the loading of funds on to debit cards, debit card transactions, bank deposits and transfers, all of which used interstate wires. Throughout the scheme, the servers of DHR were located in Maryland, and Snowden was in Maryland when he transmitted wires to execute the scheme.

I have reviewed the foregoing Statement of Facts with my attorney, understand it, agree with it, and do not wish to change any part of it. I further understand that it is included as a part of my plea agreement with the government in this case.


Sarah Renee Keaton

I am the attorney for the defendant. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is an informed and voluntary one.


Arthur Robbins, Esq.
Counsel for Defendant